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June 16, 2020

VIA REGULAR MAIL

Honorable Ann Marie Donio, U.S.M.J. Mitchell Cohen Building & Courthouse 4th & Cooper Streets Camden, New Jersey 08101

RE: Sentinel Insurance Company,Ltd. v. Benedetto, et al. Civil Action No. 1:19-cv-20142-RMB-AMD

Dear Judge Donio:

As you are aware, I am representing myself pro-se as well as my law firm at this time. I am in receipt of Mr. Lento's letter requesting a conference prior to his filing a Motion to Dismiss.

Please be advised that, I take no position with regard to holding a conference, but I would be remiss if I did not question the merits of the Motion that Mr. Lento filed, withdrew and wishes to re-file.

Specifically, Mr. Lento's intended Motion is contrary to my understanding of the holding in <u>Brillhart</u>, which requires that there be a parallel case in state court which can resolve the issue pending in the Federal Court that is the subject of the declaratory judgment action. This is not present herein.

The parallel state court matter that could resolve the issue has been removed to Federal Court and consolidated with this matter. The cases now pending in the New Jersey Superior Court are the liability cases in which it is alleged that Mr. Lento's client engaged in improper conduct toward two then clients of my firm. The issue of coverage is not before the Court in either case. Therefore the circumstances required by Brillhart are not present in this case.

Nonetheless, I will most certainly abide by what the Court chooses to do.

Respectfully,
Law Offices of Conrad J. Benedetto
BY:
B1:
Conrad J. Benedetto, Esquire